

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

MOKHTAR QAID AHMED GULAIMID

1:20CR 338-1

The Grand Jury charges:

COUNT ONE

On or about August 26, 2016, in the County of Hoke, in the Middle District of North Carolina, MOKHTAR QAID AHMED GULAIMID, an alien, did knowingly make a false statement and claim that he was a citizen of the United States in order to register to vote and to vote in any Federal, State, and local election; in violation of Title 18, United States Code, Section 1015(f).

COUNT TWO

On or about August 26, 2016, in the County of Hoke, in the Middle District of North Carolina, MOKHTAR QAID AHMED GULAIMID did falsely and willfully represent that he was a citizen of the United States; in violation of Title 18, United States Code, Section 911.

COUNT THREE

On or about November 8, 2016, in the County of Hoke, in the Middle District of North Carolina, MOKHTAR QAID AHMED GULAIMID, an alien,

knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, Member of the United States Senate, and Member of the House of Representatives; in violation of Title 18, United States Code, Section 611(a).

#### COUNT FOUR

On or about December 21, 2016, in the Counties of Durham, Hoke and Moore, in the Middle District of North Carolina, and elsewhere, MOKHTAR QAID AHMED GULAIMID, an alien, knowingly attempted to procure his naturalization as a United States citizen contrary to law, by making a false statement regarding his naturalization application, to wit:

- a. On Part 12, question 1 of GULAIMID's naturalization application (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" he answered "no" when in fact as he then knew, he had claimed to be a United States citizen when he completed a voter registration application on August 26, 2016.
- b. On Part 12, question 2 of GULAIMID's naturalization application (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State or local election in the United States?" he answered "no" when in fact as he then knew, he had registered to vote by completing a voter registration application on August 26, 2016.
- c. On Part 12, question 3 of GULAIMID's naturalization application (Form N-400), in response to the question "Have you

EVER voted in any Federal, State or local election in the United States?" he answered "no" when in fact as he then knew, he had voted in the 2016 General Election on November 8, 2016.

All in violation of Title 18, United States Code, Section 1425(a).

### COUNT FIVE

On or about December 21, 2016, in the Counties of Durham, Hoke, and Moore, in the Middle District of North Carolina, and elsewhere, MOKHTAR QAID AHMED GULAIMID, an alien, did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, and present a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder in a manner contrary to law, that is, MOKHTAR QAID AHMED GULAIMID stated falsely in an Application for Naturalization, Form N-400: (1) that he had never claimed to be a United States citizen, when in fact, as he then and there knew, he had claimed to be a United States citizen in a voter registration application, on or about August 26, 2016; (2) that he had never registered to vote in any Federal, State, or local election in the United States, when in fact, as he then and there knew, he had registered to vote in a Federal, State or local election in the United States on or about August 26, 2016; (3) that he had never voted in any Federal, State, or local election in the United States, when in fact, as he

then and there knew, he had voted in the 2016 General Election on November 8, 2016; in violation of Title 18, United States Code, Section 1546(a).

#### COUNT SIX

On or about May 4, 2017, in the County of Durham, in the Middle District North Carolina, MOKHTAR QAID AHMED GULAIMID, an alien, knowingly attempted to procure his naturalization as a United States citizen contrary to law, by making a false statement during an examination of his naturalization application, to wit: by affirming under oath that:

- a. He had never claimed to be a U.S. citizen (in writing or any other way), when in fact as he then knew, he had claimed to be a United States citizen when he completed a voter registration application on August 26, 2016.
- b. He had never registered to vote in any Federal, State or local election in the United States, when in fact as he then knew, he had registered to vote by completing a voter registration application on August 26, 2016.
- c. He had never voted in any Federal, State or local election in the United States, when in fact as he then knew, he had voted in the 2016 General Election on November 8, 2016.

All in violation of Title 18, United States Code, Section 1425(a).

## COUNT SEVEN

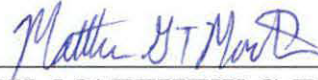
On or about May 4, 2017, in the County of Durham, in the Middle District of North Carolina, MOKHTAR QAID AHMED GULAIMID, an alien, did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, and present a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder in a manner contrary to law, that is, MOKHTAR QAID AHMED GULAIMID stated falsely during an examination of his Application for Naturalization, Form N-400: (1) that he had never claimed to be a United States citizen, when in fact, as he then and there knew, he had claimed to be a United States citizen in a voter registration application, on or about August 26, 2016; (2) that he had never registered to vote in any Federal, State, or local election in the United States, when in fact, as he then and there knew, he had registered to vote in a Federal, State or local election in the United States on or about August 26, 2016; (3) that he had never voted in any Federal, State, or local election in the United States, when in fact, as he then and there knew, he had voted in the 2016 General Election on November 8, 2016; in violation of Title 18, United States Code, Section 1546(a).

## COUNT EIGHT

On or about May 4, 2017, in the County of Durham, in the Middle District of North Carolina, MOKHTAR QAID AHMED GULAIMID, an alien, did knowingly make a false statement under oath in a case, proceeding, and matter relating to, and under, and by virtue of any law of the United States relating to naturalization, citizenship, and registry of aliens, that is, MOKHTAR QAID AHMED GULAIMID stated falsely under oath during examination of his Application for Naturalization, Form N-400: (1) that he had never claimed to be a United States citizen, when in fact, as he then and there knew, he had claimed to be a United States citizen in a voter registration application, on or about August 26, 2016; (2) that he had never registered to vote in any Federal, State, or local election in the United States, when in fact, as he then and there knew, he had registered to vote in a Federal, State or local election in the United States on or about August 26, 2016; (3) that he had never voted in any Federal, State, or local election in the United States, when in fact, as he then

and there knew, he had voted in the 2016 General Election on November 8, 2016; in violation of Title 18, United States Code, Section 1015(a).

DATED: August 31, 2020

A handwritten signature in blue ink, appearing to read "Matthew G.T. Martin", is written over a horizontal line.

BY: MATTHEW G.T. MARTIN  
United States Attorney

A TRUE BILL:

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FOREPERSON